

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Case No. 25-cv-10676

**DECLARATION OF ANWEN HUGHES IN SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

I, Anwen Hughes, declare under penalty of perjury that the statements that follow are true and correct:

1. I am one of the attorneys for Plaintiffs in the above-captioned case.
2. I was admitted to the New Jersey bar in 1998. I graduated from Yale Law School in 1998 and from Yale College in 1993. I am admitted to practice before the courts of the State of New Jersey; the United States District Courts for the District of New Jersey and the Eastern District of Wisconsin; and the United States Court of Appeals for the Third Circuit. I have appeared, and/or am appearing, *pro hac vice* in cases before the U.S. District Courts for the Central District of California, the Western District of Texas, and the District of Massachusetts.
3. I have been practicing exclusively in the field of immigration and refugee law since 1999, all of that time with Human Rights First (formerly known as the Lawyers'

Committee for Human Rights). Over the course of that time I have held various positions with the organization, where I currently serve as Director of Legal Strategy for Human Rights First's refugee programs.

4. I have supervised the representation of thousands of asylum seekers in addition to those I have represented (and continue to represent) myself before the Asylum Office, the Immigration Courts, the Board of Immigration Appeals, and the federal courts. This has included the representation of many detained asylum seekers as well as advice and assistance to persons under final orders of removal.

5. I have advised on class action litigation and other civil suits brought by Human Rights First and partner organizations to challenge immigration policies affecting the rights of asylum seekers, including *Damus v. Nielsen*, No. 1:18-cv-00578-JEB (D.D.C. filed Mar. 15, 2018) (class action challenging DHS policy and practice of categorically detaining asylum seekers to deter others from seeking asylum); *Human Rights First v. Wolf*, 1:20-cv-03764-TSC (D.D.C. filed Dec. 21, 2020, closed Sept. 10, 2021)(challenge to asylum eligibility regulations); *Capitol Area Immigrants' Rights Coalition v. Trump*, 471 F. Supp. 3d 25 (D.D.C. 2020) (challenge to third-country transit ban to asylum eligibility). I am currently co-counsel in *E.Q. v. DHS*, No. 1:25-cv-00791-UNA (D.D.C. filed Mar. 17, 2025) (challenge to rule allowing adjudication of mandatory bars to asylum in credible fear interviews) and *Svitlana Doe v. Noem*, No. 1:25-cv-10495-IT (D. Mass. filed Feb. 28, 2025) (class action challenging rescission of humanitarian parole programs and suspension of adjudication of parolees' applications for immigration status or benefits).

6. I have also represented and advised on the representation of non-citizens in federal appeals of their removal orders, federal habeas petitions, and challenges to the

adjudication of individual applications for immigration benefits. I direct Human Rights First's amicus briefing in cases relevant to refugee rights and have drafted amicus briefs on behalf of Human Rights First to the federal district courts, courts of appeals, and the United States Supreme Court.

7. I regularly present on asylum and immigration-law topics at national and regional conferences for groups including the Federal Bar Association and the American Immigration Lawyers' Association. I teach asylum and refugee law as an adjunct at New York University Law School.

8. Neither I nor any co-counsel are receiving reimbursement from individual plaintiffs or class members in this case. All counsel in this case are qualified and capable of adequately and fairly protecting the interests of the individual plaintiffs and the proposed class and possess the commitment and resources to prosecute the case as a class action.

s/Anwen Hughes

Anwen Hughes

Executed at Jackson Heights, New York,
on March 23, 2025.